

Memorandum

Office of the Secretary of Transportation

ACTION: New Security Requirements for Sharing Data

Subject: from the Federal Personnel and Payroll System (FPPS)

Date: DEC 21, 2004

Linda J. Washington// Jeffrom: Deputy Assistant Secretary/

for Administration

A Phomas Park Deputy Chief Financial Officer and

Chair, FPPS Steering Committee

To: Human Resource Council (HRC)

Financial Management Committee (FMC)

As the U.S. Department of Transportation (DOT) prepares to migrate from the current Human Resources (HR) and Payroll Systems to the Department of Interior's Federal Personnel and Payroll System (FPPS), there is a continued need to share HR and Payroll information with other DOT systems. Beginning with the implementation of FPPS in April 2005, DOT will stand up an Interface Repository (IR). This repository will act as a conduit for data exchanges between FPPS, the electronic Learning Management System (eLMS), the Consolidated Automated System for Time and Labor Entry (CASTLE), and our Delphi financial management system, as illustrated in Attachment 1, "Interface Repository Application Architecture." All DOT systems with a valid need for information from FPPS, eLMS or CASTLE will receive data from the IR. A proposed Memorandum of Agreement (MOA) will need to be submitted to the DOT FPPS Program Configuration Manager to initiate or change a connection to the IR. Since the IR will be replacing the data source for the current interfaces, new MOAs will need to be requested for all existing interfaces. Further details on this process are provided below.

As part of the services provided by FPPS, we will use the FPPS Datamart for most Departmental HR and Payroll reporting. The Datamart comes with over 200 canned reports and will provide the capability for select users to create their own reports. The Datamart also contains certain data, including transactions, not available through the IR. The Datamart will additionally enable all users to extract data in a format readily available for transfer to another system, e.g., downloading the data from a report into Excel. However, the capability of downloading data for sharing with another system should not be construed as a license to do so. It is prohibited to use data extracted from the IR or Datamart as a means to share data with another system without an approved MOA. Personnel who download information into another system from the IR or Datamart may be in violation of the Privacy Act of 1974, U.S.C. § 552a, as amended and may suffer criminal penalties provided by the Privacy Act. At the very least, they will lose their access to FPPS data and may be subject to disciplinary action.

DOT FPPS approving officials will be responsible for ensuring that interfacing systems are certified and accredited in accordance with Federal certification and accreditation (C&A)

standards prior to approving requests to interconnect with or import data from the IR or Datamart. Certification involves testing and evaluating the technical and non-technical security features of the interfacing system to determine the extent to which it meets a set of specified security requirements. Accreditation is the official approval by a Designated Approving Authority (DAA) or other authorizing management official that the system may operate for a specific purpose using a defined set of safeguards at an acceptable level of risk. The C&A process is applicable for both emerging systems and those already in production. For guidance on performing a C&A, see U.S. Department of Transportation, Office of the Secretary, Departmental Guide to Certification/Accreditation of Information Systems, DOT H 1350.253.

In addition to the completion of a C&A, an MOA containing a Security Memorandum of Understanding must be completed and signed by the applicable parties before any data is exchanged between the IR or Datamart and each interfacing system. Included in the MOA are access methods, data security and encryption, rules of behavior, and data requirements. The MOAs will also stipulate the requirement for controlled access to downloaded data from the IR or Datamart and prohibit sharing of the data with tertiary systems. Secondary system owners who are currently passing data to tertiary systems should begin working with the tertiary systems to prepare a proposed MOA if a valid business need exists for the interface. The final approval of the MOA will rest with the DOT organization responsible for the data, i.e., M-12 for HR data and B-30 for payroll data. Any interfaces not supported by a new MOA and a current C&A will be terminated upon migration to FPPS. Procedures on the submission process of MOAs are forthcoming.

Questions relating to interconnectivity or the download of data from the IR or Datamart should be addressed to Bob Heller, DOT FPPS Configuration Manager, at (202) 366-9401. Computer security related questions should be directed to the Chief Information Officer (CIO) Office of your organization.

Attachment

Attachment 1 Interface Repository Application Architecture

